



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
DENVER, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

**MAY 16 2014**

Ref: 8ENF-UFO

CERTIFIED MAIL 7008-3230-0003-0727-5355  
RETURN RECEIPT REQUESTED

Mr. Dean Rodne  
RM Resources LLC  
P.O. Box 438  
Medora, ND 58645

Re:     Underground Injection Control (UIC)  
        Notice of Violation: Failure to Submit Annual Monitoring and Fluid Analysis Report

Dear Mr. Rodne:

After review of our files, the Environmental Protection Agency (EPA) finds that RM Resources LLC failed to comply with one or more 2013 report submission requirements by the due date of February 15, 2014. The applicable report submission requirements are described below and apply to the well listed in the enclosure to this letter. As in past years, the EPA provided a courtesy reminder notice to RM Resources LLC about the report submission requirement and the February 15, 2014, deadline in a letter dated December 17, 2013, sent to RM Resources LLC.

**Annual Monitoring Report:** The UIC regulations at Title 40 of the Code of Federal Regulations, Section 146.23(c) and RM Resources LLC's UIC permit at Part II, requires an annual submission of observations of each injection well's injection tubing pressure and injection flow rate. A UIC permit may also require reporting each injection well's observed annulus pressures. For the 2013 reporting year, RM Resources LLC failed to submit the required tubing pressure, injected volume and, where applicable, annulus pressure monitoring information for the wells described in the enclosure by the February 15, 2014, deadline. Our records show this complete report was never received in our office. Failure to comply with this requirement is a UIC permit violation and a UIC regulatory violation.

**Fluid Analysis:** The UIC regulations at Title 40 of the Code of Federal Regulations, Section 146.23(c) and RM Resources LLC's UIC permit at Part II, requires an annual submission of a chemical analysis representative of fluids injected at each injection well, analyzed for total dissolved solids, specific gravity, specific conductivity, and pH. For the 2013 reporting year, RM Resources LLC failed to submit the required fluid analysis information for the wells described in the enclosure by the February 15, 2014, deadline. Our records show this complete report was never received in our office. Failure to comply with this requirement is a UIC permit violation and a UIC regulatory violation.

Within thirty (30) days of receipt of this letter, please submit a letter describing what action RM Resources LLC intends to take regarding this matter. If RM Resources LLC has not already done so, then immediately come into compliance with the reporting requirements specified in this letter.

Failure to comply with a UIC Permit or the UIC regulations found at 40 CFR Parts 144 through 148 constitute one or more violations of the Safe Drinking Water Act, 42 U.S.C. § 300h. Such non-compliance may subject you to formal enforcement by the EPA, as codified at 40 CFR Part 22. Administrative penalties for violations in the UIC program may be assessed by the EPA in an amount up to \$16,500 per day of violation for each violation. Civil penalties for violations in the UIC program may be assessed by the Department of Justice in an amount up to \$32,500 per day of violation for each violation. Other actions authorized by the Safe Drinking Water Act in response to UIC violations include, as applicable, terminating RM Resources LLC's UIC permit and authorization to inject.

If you have any questions concerning this letter, you may contact Sarah Roberts at (303) 312-7056. Please direct all correspondence to the attention of Sarah Roberts at Mail Code 8ENF-UFO.

Sincerely,

  
Mark Chalfant, Acting Director  
UIC/FIFRA/OPA Technical Enforcement Programs

Enclosure (list of applicable injection wells)

cc: Tex Hall, Chairman  
404 Frontage Road  
New Town, ND 58763-9404

Edmund Baker, Environmental Director  
404 Frontage Road  
New Town, ND 58763-9404



# UNDERGROUND INJECTION CONTROL - DEEP WELL PROGRAM

## WELL INVENTORY REPORT (Sorted by Operator)

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File No:      Well Name / Well Type / Oper Status:      N/E/C:      Oil Field Name:      S/T/R:      State:      Tribe Name:

**RMR08   RM Resources**

3654 West River Road

Medora City, MT 58645

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ND21199-08253   Spletstoser 43-8      New      NESE S8 T152N R88W   ND      Fort Berthold  
Commercial Salt Water Disposal (2D)  
AC (Active)

**Number of Wells - RM Resources - AC (Active): 1**

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**Total Number of Wells - RM Resources: 1**

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**Total Number of Wells for this Report: 1**